## IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

WILLIAM HARVEY GOODLING

Goodling, William Harvey : CASE NO. 1:21-bk-01819

**KELLY JEAN GOODLING**:

Debtors

: CERTIFICATE OF DEFAULT

ORRSTOWN BANK, :

Movant

WILLIAM HARVEY GOODLING
Goodling, William Harvey
KELLY JEAN GOODLING,

Respondents :

:

## ANSWER TO CERTIFICATE OF DEFAULT

The Debtors believe they are current on the stipulation payments and will provide proof of payment.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

Dorothy L. Mott, Esquire Attorney ID 43568 Mott & Gendron Law 125 State Street Harrisburg, PA 17101 (717) 232–6650 TEL (717) 232-0477 FAX doriemott@aol.com